

## **ADVISORY BULLETIN CONCERNING ROUTINE ELECTRICAL MAINTENANCE AT MANUFACTURING AND INDUSTRIAL FACILITIES**

Recently this office has received several questions from large manufacturers regarding how the new statewide electrical licensing program (KRS Chapter 227A) applies to their operations. These manufacturers employ electricians who perform various types of electrical work ranging from simple maintenance to new construction and installations. This Advisory Bulletin provides our interpretation of the types of electrical work done in an industrial setting are required to be supervised or performed by licensed electricians.

### **Routine maintenance does not require a permit or licensed electricians**

In general, all work which requires a permit must be supervised or performed by a licensed electrician. KRS 227.480 (2) requires that permits only be issued to licensed electrical contractors. However, no permit is required for routine repairs or maintenance. KBC 105.2 Furthermore, KRS 227A.030(2) states that a license is not required for a "maintenance worker or maintenance engineer performing routine maintenance of electrical systems . . ." The definition of "routine maintenance of electrical systems" is found in KRS 227A.010 (9). According to that statute, routine maintenance of electrical systems includes:

"The routine and periodic servicing of electrical systems, including cleaning, inspecting and making adjustments to ensure the proper operation and the removal or replacement of component parts. "Routine maintenance of electrical systems" does not include installation of complete electrical systems."

Many of the functions of industrial electricians should fall within this definition and can be considered maintenance. Repairs and replacement of component parts may be performed by unlicensed maintenance electricians. This would include replacement of wiring, junction boxes, panels or other electrical components with comparable replacement parts. This would also include installation or upgrading of machinery into existing electrical wiring.

Maintenance would not include installation of complete wiring systems. New branch circuits or service panels provide the entire wiring path to equipment and thus are deemed to be a complete electrical system. New branch circuits and service panels therefore must be done under permit and under the supervision of licensed electricians.

### **Option to obtain an annual permit**

Manufacturers who are concerned that their regular activities might exceed the bounds of routine maintenance have the option to obtain an annual permit under KBC 105.1.1. A single annual permit allows extensive electrical work to be performed for a period of one year at a particular manufacturing or industrial facility. A manufacturer seeking an annual permit would be required to obtain an Electrical Contractor's license and to employ a Master Electrician to supervise or perform the electrical work covered by the permit. While annual permits have been authorized by the Kentucky Building Code for several years, they have not been issued to date. The Office is currently developing procedures for issuance of annual permits.

Please contact General Counsel Frank Dempsey at (502) 573-0365 ext.144 for additional information.